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*Attorneys for Plaintiff*  
*Arch Insurance Company*

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA

ARCH INSURANCE COMPANY, a  
 Missouri Corporation,

Plaintiff,

v.

KNIGHT SPECIALTY INSURANCE  
 COMPANY, a Delaware Corporation,

Defendant.

Case No. 2:21-CV-00723-RFB-BNW

**SECOND STIPULATION AND ORDER  
 TO EXTEND TIME TO FILE  
 RESPONSE AND REPLY TO MOTION  
 FOR RECONSIDERATION OF ORDER  
 ON MOTIONS FOR SUMMARY  
 JUDGEMENT (ECF Nos. 16 and 17);  
 REQUEST FOR STAY OF  
 PROCEEDINGS (ECF. No. 26)**

Plaintiff Arch Insurance Company (“Arch”) and Defendant United Specialty Insurance Company, erroneously named as Knight Specialty Insurance Company (“USIC”), by and through their attorneys (collectively, “Parties”), hereby stipulate and request that the Court again extend the time for Arch to file a response, and USIC to file a reply, regarding USIC’s Motion for Reconsideration of Order On Motions for Summary Judgement (ECF Nos. 16 and 17); Request for Stay of Proceedings (ECF No. 26) (referred to collectively as “Motion”). This is the Parties’ second request to extend the briefing schedule relating to the Motion.

The Parties’ stipulate and request that the Court extend the deadlines on the Motion as follows:

**STIPULATION**

1. WHEREAS, USIC filed the Motion on November 18, 2022 (ECF No. 26).
2. WHEREAS, on November 28, 2022 this Court granted a 7-day extension to respond to the Motion due to the Thanksgiving Holiday and unavailability of counsel and client to

1 communicate regarding the Motion. USIC's Reply was to be due 7 days later, pursuant to the  
2 Federal Rules of Civil Procedure (ECF No. 29).

3 3. WHEREAS, Arch requested from USIC an additional 7-day extension to respond to  
4 the Motion due to Dylan Todd being ill and further unavailability of counsel and client to  
5 communicate regarding the Motion.

6 4. WHEREAS, in response to Arch's second request, USIC requested an extension of  
7 time to file its Reply, because both counsel and her client are out of the office at different times over  
8 the holiday period on pre-paid and pre-scheduled vacations, and will be unavailable to communicate  
9 regarding the Reply if USIC were held to the 7-day time frame to reply pursuant to the Rules.

10 5. WHEREAS, the Parties agree that Arch's response to the Motion will be filed and  
11 served on **December 23, 2022**.

12 6. WHEREAS, the Parties agree that USIC's reply in support of the Motion will be  
13 filed and served **January 12, 2023**.

14 7. WHEREAS, Arch agrees to a stay and/or withholding of any enforcement and/or  
15 collection efforts relating to the Court's October 24, 2022 summary judgment ruling (ECF No. 25)  
16 until after an Order is issued on the Motion.

17 Respectfully Submitted,

18 Dated: December 1, 2022

19 GUST ROSENFELD P.L.C.

CLYDE & CO LLP

20 /s/ Jennifer Kalvestran

/s/ Dylan Todd

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23 *Attorneys for Defendant*  
24 *United Specialty Insurance Company,*  
*erroneously named as Knight Specialty*  
25 *Insurance Company*

*Attorneys for Plaintiff*  
*Arch Insurance Company*

26  
27 IT IS SO ORDERED.

  
26 RICHARD F. BOULWARE, II  
27 UNITED STATES DISTRICT JUDGE

28 DATED this 2nd day of December, 2022.